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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CRAIG ZUCHELKOWSKI,

Plaintiff,

v.

GEICO GENERAL INSURANCE
COMPANY, a Foreign Corporation; LEIGH
AUBUCHON, an individual; DOES I through
XX, inclusive; and ROE BUSINESS
ENTITIES I through XX, inclusive,

Defendants.

Case No. 2:20-cv-02182-GMN-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINE
DATES (FIRST REQUEST)**

The Parties to this matter, by and through their respective Counsel of Record, hereby submit this stipulation and proposed order specifically seeking to extend the discovery deadline and dates related thereto by 120 days.

IT IS HEREBY STIPULATED AND AGREED between the parties to extend the discovery deadline of August 31, 2021; the initial expert deadline of July 2, 2021; the rebuttal expert deadline of August 2, 2021; the dispositive motions deadline of September 30, 2021; and the joint pre-trial order deadline of November 1, 2021. In accordance with Local Rule 26-4, the parties state as follows:

I. DISCOVERY COMPLETED BY THE PARTIES:

The parties have served their initial disclosures as well as several supplements thereto. The

1 parties have propounded and responded to one another's respective written discovery. Plaintiff's
2 deposition is scheduled to proceed on July 27, 2021.

3 **II. DISCOVERY WHICH REMAINS TO BE COMPLETED:**

4 As indicated above, Plaintiff's deposition is scheduled to proceed on July 27, 2021. Plaintiff
5 intends to depose the relevant claims handling personnel at GEICO, all of whom reside out of state.

6 The parties will also seek to depose experts.

7 **III. REASONS WHY DISCOVERY WAS NOT SATISFIED OR COMPLETED WITHIN**
8 **THE TIME LIMIT SET BY THE DISCOVERY PLAN:**

9 The parties have been working diligently throughout the discovery process. As indicated
10 above, the parties engaged in substantive discovery efforts in terms of disclosures and written
11 discovery. However, GEICO has only recently obtained Plaintiff's written discovery responses and
12 executed authorizations thereby necessitating moving Plaintiff's deposition from May 26, 2021 to
13 July 27, 2021, roughly 30 days before the current discovery deadline.

14 **IV. GOOD CAUSE EXISTS TO GRANT THE REQUESTED EXTENSION**

15 The instant stipulation is submitted within the timeframe outlined by LR II 26-3. As stated
16 above, the parties have been working diligently on all discovery-related items but the recent
17 production of written discovery responses and executed authorizations make a 120-day extension
18 necessary. The parties anticipate this extension will be a reasonable amount of time for all
19 depositions mentioned above to take place.

20 **V. SCHEDULE FOR COMPLETION OF ALL REMAINING DISCOVERY:**

21 The parties request that the pertinent discovery deadlines set forth in the Court's Scheduling
22 Order be continued one hundred twenty (120) days, as follows:

23 A. ESTIMATE OF TIME REQUIRED FOR DISCOVERY: Pursuant to Local Rule 26-
24 1(b)(1), and with the Court's approval, discovery shall be completed on or before December 29,
25 2021.

26 B. EXPERT DISCLOSURES: Unless otherwise stated herein, and the Court so orders,
27 the date for the parties to exchange initial expert witness disclosures shall be sixty (60) days prior
28 to the discovery cut-off date, but not later than October 29, 2021, and rebuttal expert disclosures

1 shall be thirty (30) days prior to the discovery cut-off date, but not later than November 29, 2021.

2 C. DISPOSITIVE MOTIONS: Unless otherwise stated herein, and the Court so orders,
3 the date for filing dispositive motions shall be thirty (30) days after the discovery cut-off date, but
4 not later than January 28, 2022.

5 D. PRETRIAL ORDER: Unless otherwise stated herein, and the Court so orders, the
6 joint pretrial order shall be filed thirty (30) days after the date set for filing dispositive motions, but
7 not later than February 28, 2022.

8 DATED this 1st day of June, 2021

9 PAUL PADDA LAW, PLLC

10 By /s/ Srilata R. Shah

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17 Attorneys for Plaintiff

18 DATED this 1st day of June, 2021

19 McCORMICK, BARSTOW, SHEPPARD,
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21 By /s/ Jonathan W. Carlson

22 Jonathan W. Carlson, Nevada Bar No. 10536
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26 Attorneys for Defendants

27 **IT IS SO ORDERED.**

28 DATED this 1st day of June, 2021


UNITED STATES MAGISTRATE JUDGE

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